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16 UNITED STATES BANKRUPTCY COURT

17 DISTRICT OF OREGON

18 In re

19 Van's Aircraft, Inc.,

20 Debtor.

21 Case No. 23-62260-dwh11

22 **VAN'S AIRCRAFT, INC.'S MOTION
FOR ENTRY OF ORDER EXTENDING
DEADLINE TO OBJECT TO CLAIMS**

23 Van's Aircraft, Inc. ("Van's") moves this Court for entry of an order extending the
24 deadline for Van's to object to proofs of claim (other than Claim Number 572) to August 14,
25 2024, as set forth below, and states as follows:

26 1. The Court entered its Order Confirming Debtor's Plan of Reorganization Pursuant
to 11 U.S.C. § 1191(b) [ECF No. 143] on May 16, 2024 (the "Plan"). The Plan became effective
on June 1, 2024 (the "Effective Date").

27 2. Pursuant to Article 7.1 of the Plan, unless otherwise ordered by this Court, all
28 objections to Claims and Scheduled Amounts (other than Administrative Expense Claims) are to
29 be filed with the Court and served upon the holder of the Claim objected to on or before sixty
30 days after the Effective Date, which deadline is July 31, 2024 (the "Claim Objection Deadline").

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TO OBJECT TO CLAIMS**

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1 3. There over 230 proofs of claim which Van's has identified as subject to a
2 potential objection.

3 4. Van's professionals have been working to confer with claimants in accordance
4 with Local Bankruptcy Rule 3007-1(b)(2). The conferral process has yielded positive results,
5 with at least 65 claimants agreeing to voluntarily withdraw their claims or agreeing to stipulate to
6 a different treatment of their claim.

7 5. The conferral process has nonetheless been time consuming. The vast majority of
8 claimants are not represented by counsel. In response to Van's conferral efforts, some claimants
9 have raised complicated or detailed issues about their claims, which Van's and its professionals
10 need more time to review and respond to before proceeding with filing objections to the claims.
11 Van's would prefer to resolve claims outside of the claim objection process as much as possible.

12 6. Additionally, many of Van's key personnel who have detailed knowledge of
13 customer and vendor claims have been in Oshkosh, Wisconsin for the last two weeks for a major
14 annual experimental aircraft convention. The absence of these personnel has made timely review
15 and consideration of claimant responses to Van's conferral efforts more challenging.

16 7. Van's therefore requests a two-week extension of the deadline to object to claims
17 (other than Claim Number 572) to August 14, 2024, so as to allow the conferral process to
18 continue to yield positive results, and to reduce the total number of objections to be filed with the
19 Court.

20 8. Van's certifies that, for the reasons set forth herein, the requested extension is in
21 good faith, Van's appropriately used the prior time, and that the continuance is being requested
22 at the earliest time practical. This is Van's first request for an extension of the Claim Objection
23 Deadline.

24 9. Attached hereto as **Exhibit 1** is a proposed Order Extending Deadline to Object to
25 Claims.

1 10. WHEREFORE, Van's prays this Court enter the Order Extending Deadline to
2 Object to Claims.

3 DATED: July 30, 2024.

4 TONKON TORP LLP

5 By /s/ Ava Schoen

6 Timothy J. Conway, OSB No. 851752
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EXHIBIT 1

Proposed Form of Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Van's Aircraft, Inc.,

Debtor.

Case No. 23-62260-dwh11

**ORDER EXTENDING DEADLINE TO
OBJECT TO CLAIMS**

THIS MATTER having come before the Court upon Van's Aircraft, Inc.'s Motion for Entry of Order Extending Deadline to Object to Claims [ECF No. __] (the "Motion"), and the Court having reviewed the Motion and otherwise being duly advised in the premises; NOW, THEREFORE,

IT IS HEREBY ORDERED that the deadline for Van's Aircraft, Inc. to object to claims (other than Claim Number 572) is extended to August 14, 2024.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By _____

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